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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$20,337.00 in U.S. CURRENCY

Defendant Property.

Case No. 17-CV-149-MLC

**APPLICATION FOR ENTRY OF
DEFAULT**

TO THE CLERK OF THE COURT:

Plaintiff hereby requests that an entry of default be entered pursuant to Rule 55(a) of the Federal Rules of Civil Procedure against all persons for failure to maintain or file a claim to the *Verified Complaint for Forfeiture In Rem* (hereafter "*Verified Complaint*") in this action under the provisions of 18 U.S.C. § 983(a)(4)(A) and Rule G(5)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions to the Federal Rules of Civil Procedure as to the defendant property, \$20,337.00 in United States Currency (hereafter defendant property).

On September 6, 2017, the United States filed a *Verified Complaint* in this case. The *Verified Complaint* sought the civil forfeiture of defendant property as described in more detail in the *Verified Complaint*. The *Verified Complaint* alleged the defendant property was seized

from Jacob C.A. Dotson and Dustin L. Alvis on July 8, 2017, at Trout Lake Trailhead, Yellowstone National Park, Wyoming. The *Verified Complaint* alleged that the defendant property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) as proceeds or money traceable to controlled substances exchange, or money used to facilitate the commission of a controlled substance offense.

On September 8, 2017, a *Notice of Forfeiture Action* was sent by certified mail, along with the *Verified Complaint*, to Jacob C.A. Dotson and Dustin L. Alvis. See Exhibit A. The *Notice of Forfeiture Action* advised Jacob C.A. Dotson and Dustin L. Alvis they had 35 days from September 8, 2017, to file a verified claim to the defendant property in this Court. See ECF Doc. 3).

Beginning on September 12, 2017, and continuing for at least 30 consecutive days, the *Notice of Civil Forfeiture* was posted on an official government website (www.forfeiture.gov) as required by Rule G(4)(a)(iv)(C). The declaration of publication is attached as Exhibit B.

The time period for filing a claim by any person expired on October 16, 2017. Jacob C.A. Dotson and Dustin L. Alvis were served personally and have failed to file a claim for the defendant property. See Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Rules G(4)(b) and G(5)(a).

No potential claimant to the defendant property is an infant, incompetent, or in military service within the meaning of the Service Members' Civil Relief Act of 2003, 50 U.S.C. App. §§ 511(1) and (2).

The United States has fully complied with the notice requirements and has afforded all

parties due process in this action. Therefore, the United States seeks an Entry of Default against all persons noticed for failure to file a claim in this action as to the defendant property.

The Entry of Default is submitted herewith.

DATED this 18th day of October, 2017.

Respectfully submitted,

JOHN R. GREEN
Acting United States Attorney

By: /s/ Stephanie A. Hambrick
STEPHANIE A. HAMBRICK
Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that on this 18th day of October, 2017, I served true and correct copies of the foregoing **Application for Entry of Default** upon the follow persons.

Jacob C.A. Dotson
147 North Prairie Street, #18
Galesburg, IL 61401

Dustin Alvis
908 North 21st Street
Mattoon, IL 61938

/s/ Lisa Wait
UNITED STATES ATTORNEY'S OFFICE